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FEDERAL COMMUNICATIONS COMMISSION
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December 21, 1992

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Secretary,
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FCC MAIL ROOM

Dear Secretary:

RE: PR Docket 92-273
~~Wisconsin Public~~ Safety Region 45

The Region 22 (Minnesota) NPSPAC Planning Committee wishes to make the following comments on the proposed NPSPAC Plan for Region 45:

1. On July 10, 1992 the Region 22 (Minnesota) NPSPAC Planning Committee expressed concern (see Attachment "A") to the Region 45 (Wisconsin) Planning Committee about what seemed to be a disproportionate number of channels being allocated for certain Region 45 counties that share a common border with Minnesota and are in close proximity to the heavily populated Minneapolis / St. Paul metropolitan area. We were cognizant that Wisconsin had preceded Region 22 in the "channel packing" for the NPSPAC channels and that we would be expected to temper our channel allocations around their existing assignments. I would, however, be remiss in my role as Chairman of the Region 22 Planning Committee if I were to forego any further comments as permitted by your invitation for comments on this docket.

The Wisconsin counties involved, their population, and the number of channels proposed in the Wisconsin Plan are as follows:

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HENNEPIN COUNTY

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COUNTY	1990 Census	Projected 2000 Census	Channels Proposed
1. Burnett	13,557	14,958	5
2. Polk	36,991	40,923	7
3. St. Croix	50,177	57,030	8
4. Pierce	33,949	37,844	7
TOTAL	134,674	150,755	27

Seven (7) Minnesota counties, that contain the greater Minneapolis/St. Paul metropolitan area, are very aggressively involved in planning a seven county-wide public safety 800 MHz trunked communication system to serve their entire Public Safety community. We anticipate that the NPSPAC channels will necessarily be perhaps the sole spectrum resource for this very sizeable communication system, however their quantity and limitations being placed on certain channels by Region 45 may seriously limit the project.

The Minnesota counties in which this large system will be operating, their population and number of channels made available by the proposed Region 22 NPSPAC Plan (to be filed with the Commission on January 4, 1993) are as follows:

County	1990 Census	Projected 2000 Census	Channels Proposed
1. Anoka	243,641	281,110	9
2. Carver	47,915	62,220	4
3. Dakota	275,227	337,630	9
4. Hennepin	1,032,431	1,108,110	38
5. Ramsey	485,765	503,010	20
6. Scott	57,846	76,910	4
7. Washington	145,896	177,340	6
TOTAL	2,288,721	2,546,421	90

At the time Region 22 was "packed" for the Regional Plan we attempted to use the suggested ratio of "1 channel per 25,000 expected population" however, as illustrated above, this was not possible for the Minnesota counties listed.

Conversely, the ratio for the Wisconsin counties listed above is approximately "1 channel for each 5,500" of expected population. We believe this to have been a significant factor in the limited channel allocation for the 7 county metropolitan Minneapolis/St. Paul area.

2. There is every reason to believe that a flaw in the computer sort, when the NPSPAC channels were packed for Regions 22 and 45, allowed certain channels to be assigned that will be in conflict. For example, channel 608 has been designated for use in St. Croix County Wisconsin and also in Washington County Minnesota. These two counties border each other with only the St. Croix river separating them.

Also, channels 628, 780, and 820 designated for the "State of Wisconsin" in the Region 45 Plan and for state-wide use, have been assigned for use in Minnesota counties immediately adjacent to the Wisconsin border, again with only the St. Croix or Mississippi rivers for separation. Channels 666, 704, and 742, designated for the State of Wisconsin and presumably for state-wide use, have been assigned in Hennepin County, Minnesota which most likely will pose a conflict.

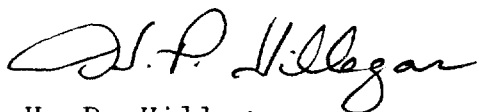
At the request of Region 45, Region 22 has added language in our proposed Regional Plan that requires Minnesota to "coordinate these Minnesota assigned channels with Wisconsin" prior to their actual use.

Region 45 has indicated (Attachment "B") that they will, until June 30, 1994, "pay special attention to the proposed Minnesota frequency assignments and will not make allocations based on non-use of frequencies in the seven counties identified" for which we are very appreciative.

Minnesota Region 22 however remains very much concerned that the implementation of the proposed seven-county Public Safety system for the Minneapolis/St. Paul metropolitan area may be seriously hindered by these two conditions if allowed to prevail.

Region 22 requests therefore that the Commission consider our concerns as the proceedings for this referenced docket occur.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "H. P. Hillegas".

H. P. Hillegas
Chairman, Region 22 Planning Committee
% HENNEPIN COUNTY
Hennepin County Government Center
Minneapolis, MN 55487-0007

(612) 348-5555

C O P Y

July 30, 1992

Mr. Richard J. Shulak, Chairman
Region 45 800 MHz Planning Committee
P.O. Box 7912
Madison, WI. 53707-7912

Dear Mr. Shulak:

Thank you for the opportunity to review the proposed 800 MHz Plan for Region 45.

Considering that the "frequency packing" for your region and our adjacent Region 22 was accomplished by the CET program there should be little concern about their compatibility with each other.

As we mentioned in a phone conversation last year however we were not able to allocate as many channels in the seven (7) county Minneapolis/St. Paul metropolitan area as once desired. This metropolitan area has a population in excess of 2,250,000 which is 52 % of the state's total population, however its allocation of channels is in competition with some of your relatively less populated western counties such as St. Croix, Polk, and Pierce. For example, our Washington county with a population of 146,000 and a part of this fast growing seven county metropolitan area could only be allocated 6 channels. Conversely your two counties, St. Croix and Pierce, that border our Washington county on the St. Croix river and with a combined population of only 84,000 has a total of 15 channels.

There were other factors too that limited our allocation of channels in this metropolitan area and we realize that yours alone does not totally account for the apparent disparity.

At this time we would like request that the "door be left open" for adjustments in later years should our allocation be found to be too limited and yours not totally needed.

ATTACHMENT " A "

We wish you the best in implementing your 800 Plan. You will be receiving a final draft of the plan for Region 22 sometime in August. It is now being printed for distribution to all participants.

Thanks for your consideration and cooperation.

H. P. Hillegas, Chairman
Region 22 800 Planning Committee
A-023 Government Center
Minneapolis, MN 55487-0007

Attachment "A"

**Wisconsin Department of Transportation**Tommy G. Thompson
GovernorCharles H. Thompson
SecretaryDIVISION OF STATE PATROL
4802 Sheboygan Avenue
P.O. Box 7912
Madison, WI 53707-7912

December 7, 1992

Harry Hillegas
300 South 6th St.
Minneapolis, MN 55487

Dear Harry:

I have received your meeting notice and I do plan to attend.

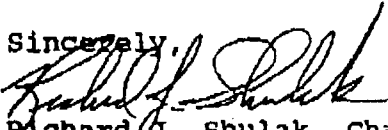
I am in agreement with the addition of Section 6.8 to your plan. As previously discussed, this will reduce unintentional adjacent and co-channel interference across state lines.

I am aware of the metropolitan-wide trunking system that is being designed for your area. I applaud your efforts. During your proposed freeze period, Wisconsin will pay special attention to the proposed Minnesota frequency assignments and we will not make allocations based on the non-use of frequencies in the seven counties you have identified.

I believe the guard frequency assignments to be a serious problem for both States. If you cannot find alternatives to the guard frequency assignments or if we cannot use the Statewide frequencies in that area that we normally could have used and are without other alternatives, then we both suffer. I like the intent of the additional Section 7.8, but I think the phrase "close proximity" is too vague for our work. I would rather see a definite mileage substituted for that phrase. Would a change to "...as their proposed use within seventy five miles of the Wisconsin border shall be first coordinated with the Wisconsin region" be agreeable?

I am looking forward to seeing you again.

Sincerely,


Richard J. Shulak, Chairman
Wisconsin Region 45ATTACHMENT "B"